

Fish Management Office

Ms. Anne Badgley
Regional Director
U.S. Fish and Wildlife Service
911 NE Eleventh Avenue
Portland, Oregon 97232-4181

Dear Ms. Badgley:

I am writing this letter on behalf of the Bonneville Power Administration, Army Corps of Engineers, and Bureau of Reclamation (collectively, the Action Agencies). In December 1999, these Action Agencies submitted to the U.S. Fish and Wildlife Service (FWS) a biological assessment on the effects of operation and configuration of the Federal Columbia River Power System (FCRPS) on threatened and endangered species and their critical habitat and requested formal consultation. Since December, the FWS and Action Agencies have discussed and analyzed ways to reduce adverse impacts on listed species of concern to FWS.

A major purpose of the proposed action is to maintain flexibility to operate the FCRPS, within defined parameters, to adjust operations in a timely manner to serve the FCRPS project's multiple functions under constantly changing conditions. In consideration of our interagency discussions and exchanges of views and biological information, the Action Agencies have chosen to further modify and clarify the parameters in the December 1999 biological assessment, subject to appropriate analysis pursuant to the National Environmental Policy Act (NEPA) and other pertinent Federal statutes, if needed. The following items summarize the modifications and clarifications to the originally proposed actions. A detailed description is included as an attachment to this letter.

a. Kootenai River White Sturgeon Flows: In an attempt to better clarify yearly operations for sturgeon flows at Libby Dam, we are proposing that a specific volume of water be identified for sturgeon flows that could be shaped in-season within existing project requirements through the Technical Management Team (Attached table 1). Until VARQ at Libby can be implemented, the volumes range from 0 to 1.6 MAF from the lowest runoff years to the highest runoff years. These volumes will be revised when VARQ is implemented.

b. Additional Capacity at Libby: The Action Agencies will seek appropriations to increase the hydraulic capacity of the project so that additional water can be released to aid sturgeon spawning without increasing total dissolved gas.

c. Ramping Rates: Year-round ramping rates at Libby and Hungry Horse Dams are proposed based on discussions with and comments from the FWS and State of Montana. These ramping restrictions are intended to provide additional protection of listed bull trout in the rivers below these projects.

d. Emergency Procedures: In order to accommodate reliability of power supply and transmission service, and flood control, there may be instances where operations for listed species may need to be modified. We proposed procedures to ensure that appropriate coordination and examination of alternatives are conducted, if possible, prior to any changes in ESA operations.

e. Annual Operating Plans: In order to maintain consistency with the National Marine Fisheries Service (NMFS) consultation discussions, we are proposing to include in the 1-year and 5-year planning process those actions and operations included in the FWS biological opinion.

f. Transmission studies and annual reports: Libby and Hungry Horse Dams are operated to provide system transmission reliability. Such operations can involve rapid increases in powerhouse discharges, which potentially impact downstream bull trout. In order to better understand and determine potential remedial measures, by February 1, 2002, and February 1, 2003, BPA will provide annual reports on the frequency and duration of the increases in discharge. BPA will also conduct studies to determine the feasibility of alternatives that would reduce the use of these projects for transmission reliability.

We believe the above measures would reduce adverse impacts to federally listed sturgeon and bull trout. In addition to consultations with FWS, the Action Agencies have also submitted a biological assessment to and engaged in consultation with the NMFS on endangered and threatened species of concern to them. The Action Agencies understand that FWS and NMFS are coordinating their reviews of FCRPS operations and configuration so that FWS is aware of the measures described in the July 2000 NMFS draft biological opinion, plus any subsequent revisions that may appear in the final NMFS biological opinion.

Please consider these changes as you prepare your biological opinion.

Sincerely,

Carl A. Strock
Brigadier General, U.S. Army
Division Engineer

Enclosure

Copies Furnished:

Mr. Steve Wright
Acting Administrator
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

Mr. J. William McDonald
Regional Director
US Bureau of Reclamation
Pacific Northwest Regional Office
1150 N. Curtis Road
Boise, ID 83706-1234

Ms. Donna Darm
Acting Regional Director
National Marine Fisheries Service
7600 Sand Point Way NE, Bldg 1
Seattle, WA 98115